



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 24, 2018

Michael Boos  
1006 Pennsylvania Ave, SE  
Washington, DC 20003

Re: ADR 837  
CITIZENS UNITED SUPER PAC LLC and Lauren Catts, Treasurer

Dear Michael Boos:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on 1/23/2018 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$5,850.00 is due on 2/22/2018. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

*Krista J. Roche*

Krista J. Roche

Director

Alternative Dispute Resolution Office

Enc: Payment Instructions  
Compliance Chart  
Negotiated Settlement

cc: Gwendolyn Holmes, Finance and Accounting Office



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Case Number: 837

Source: RAD 17L-07

Case Name: Citizens United Super PAC LLC

### NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Michael Boos, Esq., representing Citizens United Super PAC LLC and Lauren Catts, in her official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this agreement with the Commission.
3. RAD referred Citizens United Super PAC LLC and Lauren Catts, Treasurer (Respondents or the Committee) for two reporting issues. The Committee failed to dispose all financial activity on its 2016 April Quarterly Report, filing an amended report on April 29, 2016, which disclosed additional receipts totaling \$115,469.77. Additionally, the Committee failed to file two 48-Hour Reports totaling \$76,664.32 to support eighty-three (83) independent expenditures disclosed on the 2016 April Quarterly Report.
4. Treasurers of political committees are required to report all financial activity, including all receipts, pursuant to the FECA. 52 U.S.C. §§ 30104(a)(1), 30104(b)(2), 11 C.F.R. §§ 104.1, 104.3(a). A person, including a political committee, that makes or contracts to make independent expenditures aggregating \$10,000 or more at any time up to and including the 20<sup>th</sup> day before the date of an election shall file a report describing the expenditures within 48 hours. 52 U.S.C. § 30104(g) (2), 11 C.F.R. § 104.4(b)(2).
5. The Committee filed a Miscellaneous Electronic Submission (Form 99) on September 22, 2016, stating that the increased activity on the 2016 April Quarterly Report was due to "clerical errors made during the data import process." The Committee also explained in the Form 99 that the missing 48-Hour Reports were caused by a direct mail vendor who

1-800-601-0101

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